

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

LAURIE-JO STRATY; TEXAS ALLIANCE  
FOR RETIRED AMERICANS; and  
BIGTENT CREATIVE,

Plaintiffs,

vs.

GREGORY ABBOTT, in his official capacity  
as Governor of the State of Texas; and RUTH  
HUGHS, in her official capacity as Texas  
Secretary of State,

Defendants.

Civil Action No. 1:20-cv-1015-RP

Related to:

*Texas League of United Latin American  
Citizens v. Abbott*, No. 1:20-cv-1006

**DECLARATION OF SKYLER HOWTON IN SUPPORT OF PLAINTIFFS' MOTION  
FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Skyler Howton, am an attorney with the firm of Perkins Coie LLP, and counsel for Plaintiffs in the above-captioned matter. I make this declaration in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the declaration of Judy Bryant.
2. Attached hereto as **Exhibit 2** is a true and correct copy of the declaration of Nancy Michon.
3. Attached hereto as **Exhibit 3** is a true and correct copy of the declaration of Richard Shaw.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the declaration of Ellen Stupak-Shaw.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the declaration of Laurie-

Jo Straty.

6. Attached hereto as **Exhibit 6** is a true and correct copy of the declaration of Patrick Golden.

7. Attached hereto as **Exhibit 7** is a true and correct copy of the declaration of Andrés Rosas.

8. Attached hereto as **Exhibit 8** is a true and correct copy of the declaration of Ken Dearing.

9. Attached hereto as **Exhibit 9** is a true and correct copy of a United States Census Bureau page titled “*Quick Facts – Texas*,” accessed June 19, 2020 and available at <https://www.census.gov/quickfacts/TX>.

10. Attached hereto as **Exhibit 10** is a true and correct copy of a Texas Politics Project post titled “*Percent Voting by Age, Gender, Educational Attainment, Race, and Family Income: November 2000 Presidential Election*,” accessed June 19, 2020 and available at [https://texaspolitics.utexas.edu/archive/html/vce/features/0302\\_02/demographics.html](https://texaspolitics.utexas.edu/archive/html/vce/features/0302_02/demographics.html).

11. Attached hereto as **Exhibit 11** is a true and correct copy of a September 14, 2020 memorandum by Fort Bend County Attorney Ray L. Cordes, Jr., titled “*In-Person Return of Vote-By-Mail Ballots*.”

12. Attached hereto as **Exhibit 12** is a true and correct copy of a July 30, 2020 letter from Thomas J. Marshall, General Counsel and Executive Vice President, United States Postal Service to Ruth Hughs, Texas Secretary of State, available at [https://txelects.com/wp-content/uploads/2020/08/PostalService\\_July2020.pdf](https://txelects.com/wp-content/uploads/2020/08/PostalService_July2020.pdf).

13. Attached hereto as **Exhibit 13** is a true and correct copy of an August 12, 2020 United States Postal Service presentation titled “*Service Performance Measurement*,” available at

[https://oversight.house.gov/sites/democrats.oversight.house.gov/files/documents/PMG%20Briefing\\_Service%20Performance%20Management\\_08\\_12\\_2020.pdf](https://oversight.house.gov/sites/democrats.oversight.house.gov/files/documents/PMG%20Briefing_Service%20Performance%20Management_08_12_2020.pdf).

14. Attached hereto as **Exhibit 14** is a true and correct copy of an August 31, 2020 United States Postal Services presentation titled “*Congressional Briefing: Transportation & Service Performance Updates*,” available at <https://about.usps.com/newsroom/global/pdf/0831-congressional-service-briefing.pdf>.

15. Attached hereto as **Exhibit 15** is a true and correct copy of a document by the Cybersecurity and Infrastructure Security Agency Elections Infrastructure Government Coordinating Council and Sector Coordinating Council’s Joint COVID Working Group titled “*Ballot Drop Box*,” accessed on October 3, 2020 and available at [https://www.eac.gov/sites/default/files/electionofficials/vbm/Ballot\\_Drop\\_Box.pdf](https://www.eac.gov/sites/default/files/electionofficials/vbm/Ballot_Drop_Box.pdf).

16. Attached hereto as **Exhibit 16** is a true and correct copy of an August 27, 2020 Lawfare article by Axel Hufford titled “*The Rise of Ballot Drop Boxes Due to the Coronavirus*,” available at <https://www.lawfareblog.com/rise-ballot-drop-boxes-due-coronavirus/>.

17. Attached hereto as **Exhibit 17** is a true and correct copy of the July 27, 2020 Proclamation by Governor Gregory Abbott and letter of transmittal, available at [https://gov.texas.gov/uploads/files/press/PROC\\_COVID-19\\_Nov\\_3\\_general\\_election\\_IMAGE\\_07-27-2020.pdf](https://gov.texas.gov/uploads/files/press/PROC_COVID-19_Nov_3_general_election_IMAGE_07-27-2020.pdf).

18. Attached hereto as **Exhibit 18** is a true and correct copy of an October 1, 2020 KTXS12 article by CBS Austin titled, “*Texas Gov. Abbott limits drop-off sites for early mail votes*,” available at <https://ktxs.com/news/local/texas-gov-abbott-shuts-down-drop-off-sites-for-early-mail-votes>.

19. Attached hereto as **Exhibit 19** is a true and correct copy of an August 25, 2020 and

August 26, 2020 email exchange between Donna Stanart and Charles Pinney, available at <http://www.search.txcourts.gov/SearchMedia.aspx?MediaVersionID=6813ce1c-fec6-43a4-9690-5b8698784d96&coa=cossup&DT=OTHER&MediaID=fb62554f-e101-45b8-bdea-a8d7c70552bb>.

20. Attached hereto as **Exhibit 20** is a true and correct copy of a September 30, 2020 brief filed by the Office of the Attorney General of Texas in *In re Hotze* (No. 20-0751), available at <http://search.txcourts.gov/SearchMedia.aspx?MediaVersionID=56170fe5-de61-4eda-a5b4-6cdf12fa5cd2&coa=cossup&DT=BRIEFS&MediaID=4c2a3881-79c5-45cf-9f02-86b731c31a17>.

21. Attached hereto as **Exhibit 21** is a true and correct copy of a declaration of Harris County Clerk Chris Hollins, filed in *League of United Latin American Citizens v. Abbott*, No. 1:20-cv-1006.

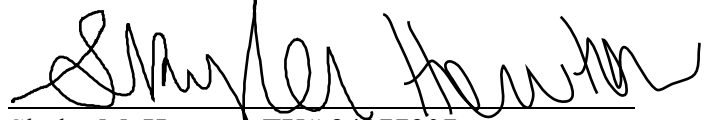
22. Attached hereto as **Exhibit 22** is a true and correct copy of the October 1, 2020 Proclamation by Governor Gregory Abbott and letter of transmittal, available at [https://gov.texas.gov/uploads/files/press/PROC\\_COVID-19\\_Nov\\_3\\_general\\_election\\_IMAGE\\_10-01-2020.pdf](https://gov.texas.gov/uploads/files/press/PROC_COVID-19_Nov_3_general_election_IMAGE_10-01-2020.pdf).

23. Attached hereto as **Exhibit 23** is a true and correct copy of an October 1, 2020 Houston Chronicle article by Zach Despart titled “*Gov. Abbott forces Harris County to close 11 mail ballot drop-off sites, leaving just one*,” available at <https://www.houstonchronicle.com/politics/texas/article/Abbott-mail-ballot-drop-off-harris-county-election-15612991.php>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 5, 2020

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Skyler M. Howton", written over a horizontal line.

Skyler M. Howton, TX# 24077907

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